



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 15, 2021

BY ECF

Hon. Richard M. Berman
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

**Re: United States v. Reza Zarrab,
S5 15 Cr. 867 (RMB)**

Dear Judge Berman:

The parties respectfully submit this letter pursuant to the Court's order dated November 1, 2021 (D.E. 707) to inform the Court regarding their positions as to what extent additional unsealing is appropriate under the current circumstances. The Government and defense counsel agree that additional unsealing is appropriate and are continuing to confer on the extent to which records appropriately should remain sealed. The parties will provide a further update regarding their proposals.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/
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cc: Robert Anello, Esq. (by ECF)